

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

<b>JOHN DOE,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No.: 2:19-CV-02336-JTF-tmp</b>
	)	
<b>RHODES COLLEGE,</b>	)	
	)	
<b>Defendant.</b>	)	

**JOINT MOTION TO MAINTAIN DOCUMENTS UNDER SEAL**

COME NOW, Plaintiff John Doe (“Plaintiff”) and Defendant Rhodes College (“Defendant,” and together with Plaintiff, the “Parties”) and, by and through the undersigned counsel, hereby jointly move this Court to place under permanent seal all documents currently under seal in the above-styled action, including but not limited to the following ECF docket entries (as well as all exhibits thereto):

- Dkt. 3;
- Dkt. 19;
- Dkt. 32;
- Dkt. 36;
- Dkts. 40-42;
- Dkts. 50-51;
- Dkt. 53;
- Dkt. 61;
- Dkt. 63;
- Dkts. 67-68;

- Dkts. 70-71;
- Dkt. 75;
- Dkt. 80; and
- Dkts. 83-85.

The foregoing documents are currently under seal pursuant to this Court's confidentiality Protective Order [Dkt. 54] and contain confidential information affecting the privacy rights of Plaintiff and other persons involved in the factual events giving rise to this litigation.

In addition, to the extent that certain documents that this Court previously ordered to be sealed have not yet been sealed by the Clerk, the Parties jointly request that such documents be placed permanently under seal. See Protective Order [Dkt. 54], Para. 1 (ordering the sealing of Dkts. 1, 5, 18, 21, and 33).

WHEREFORE, the Parties respectfully request that this Court enter the attached, proposed Order directing the clerk to maintain the foregoing documents permanently under seal.

Dated August 2, 2019.

Respectfully submitted,

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